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Proposed Co-Lead Counsel for Movant Arman Anvari and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GGCC, LLC, an Illinois Limited Liability
Company, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN,

Case No. 3:17-cv-06779-RS

**DECLARATION OF HUNG G. TA IN
OPPOSITION TO COMPETING
MOTIONS FOR LEAD PLAINTIFF AND
APPROVAL OF COUNSEL**

CLASS ACTION

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Defendants.

Judge: Hon. Richard Seeborg
Courtroom: 3, 17TH Floor

ANDREW OKUSKO, individually and on
behalf of all others similarly situated,

Case No: 3:17-cv-06829-RS

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC.,
THE TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

ANDREW BAKER, individually and on behalf
of all others similarly situated,

Case No. 3:17-cv-06850-RS

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN, an
Individual, JOHANN GEVERS, an individual,
STRANGE BREW STRATEGIES, LLC, a
California limited liability company, and DOES
1 through 100 inclusive,

Defendant.

BRUCE MACDONALD, Individually and on
Behalf of All Others Similarly Situated,

Case No. 3:17-cv-07095-RS

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN, an
Individual, TIMOTHY COOK DRAPER, an
Individual, DRAPER ASSOCATES, JOHANN
GEVERS, DIEGO PONZ, GUIDO
SCHMITZKRUMMACHER, BITCOIN
SUISSE AG, NIKLAS NIKOLAJSSEN, and
DOES1-100, INCLUSIVE,

Defendants.

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC, proposed Lead Counsel for
3 the putative class in the above-captioned action (the “Action”) and counsel to proposed Lead Plaintiff
4 Arman Anvari. I am an active member in good standing of the bar of the State of New York and will
5 apply to be admitted *pro hac vice* in this matter. I submit this declaration in support of Arman
6 Anvari’s Opposition to Competing Motions For Appointment as Lead Plaintiff and Approval of
7 Counsel.

8 2. On February 4 and 6, 2018, I conferred via telephone with Mr. William Restis of the
9 Restis Law Firm, P.C. and Messrs. Joseph DePalma and Jeremy Nash of Lite DePalma Greenberg,
10 LLC, counsel for plaintiffs GGCC LLC, Pumaro LLC, and Nick Anthony (the “GGCC Group”).

11 3. During the calls, we discussed the legal and procedural dynamics at issue at this stage
12 of the proceedings, and exchanged our respective views on how the Action should be prosecuted.

13 4. The discussions revealed a concurrence of views between our respective clients and
14 our firms concerning the prosecution of the Action. Counsel for the GGCC Group offered to work
15 collaboratively with my firm in prosecuting the Action as the need may arise. Counsel for the GGCC
16 Group also explained that Pumaro LLC, a Bitcoin purchaser and Nick Anthony, a subminimum
17 investor, are ready to be included as additional named class representatives if the need arises.

18 5. I have conferred with my client, Mr. Arman Anvari, and he is in agreement with this
19 collaborative approach.

20 6. Pursuant to Local Rule 3-7(c), Mr. Anvari has reviewed the allegations set forth in the
21 pending, first-filed Complaint (Dkt. No. 1) and intends to adopt the substance of its
22 allegations. However, Mr. Anvari reserves the right to amend the Complaint if appointed Lead
23 Plaintiff.

24 7. Attached as Exhibit A is the Company Extract of Trigon Trading Pty. Ltd., obtained
25 from the Australian Securities & Investments Commission.
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1 I declare under penalty of perjury that the foregoing is true and correct, this 8th day of
2 February 2018.

3 /s/ Hung G. Ta

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